

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

XR COMMUNICATIONS, LLC, dba  
VIVATO TECHNOLOGIES,

v.

AT&T SERVICES INC.; AT&T MOBILITY LLC;  
AND AT&T CORP.

Case No. 2:23-cv-00202-JRG-RSP

**LEAD CASE**

XR COMMUNICATIONS, LLC, dba  
VIVATO TECHNOLOGIES,

v.

VERIZON COMMUNICATIONS, INC.; CELLCO  
PARTNERSHIP D/B/A VERIZON WIRELESS

CASE NO. 2:23-cv-00203-JRG-RSP

**MEMBER CASE**

XR COMMUNICATIONS, LLC, dba  
VIVATO TECHNOLOGIES,

v.

T-MOBILE USA, INC.

CASE NO. 2:23-cv-00204-JRG-RSP

**MEMBER CASE**

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff XR Communications, LLC, dba Vivato Technologies (“Vivato”) and Defendants AT&T Services, Inc., AT&T Mobility LLC, AT&T Corp. (“AT&T”), Verizon Communications, Inc., Cellco Partnership d/b/a Verizon Wireless (“Verizon”), and T-Mobile USA, Inc., (“T-Mobile”) (collectively, the “Parties”) jointly move for entry of the attached [Proposed] Protective Order.

Dated: August 31, 2023

Respectfully submitted,

/s/ Reza Mirzaie

Reza Mirzaie (CA SBN 246953)

rmirzaie@raklaw.com

Neil Rubin (CA SBN)

nrubin@raklaw.com

Paul A. Kroeger (CA SBN 229074)

pkroeger@raklaw.com

Philip X. Wang (CA SBN 262239)

pwang@raklaw.com

James N. Pickens (CA SBN 307474)

jpickens@raklaw.com

Adam Hoffman

ahoffman@raklaw.com

Jacob Buczko

jbuczko@raklaw.com

Minna Chan

mchan@raklaw.com

Christian Conkle

cconkle@raklaw.com

RUSS AUGUST & KABAT

12424 Wilshire Blvd. 12th Floor

Los Angeles, CA 90025

Phone: (310) 826-7474

***Counsel for Plaintiff XR Communications  
LLC dba Vivato Technologies***

/s/ Melissa Smith

Melissa Smith (TX SBN 24001351)

**GILLAM & SMITH, LLP**

303 South Washington Avenue

Marshall, Texas 75670

T: (903) 934-8450

melissa@gillamsmith.com

***Counsel for Defendant T-Mobile USA, Inc.***

/s/ Deron R. Dacus

Deron R. Dacus (TX SBN 00790553)

ddacus@dacusfirm.com

THE DACUS FIRM, P.C.

821 ESE Loop 323, Suite 430

Tyler, Texas 75701

T: (903) 705-1117

***Counsel for Defendants AT&T Services Inc.; AT&T Mobility LLC; AT&T Corp., Verizon Communications, Inc.; Cellco Partnership d/b/a Verizon Wireless***

/s/ Matthew S. Yungwirth

Matthew S. Yungwirth  
msyungwirth@duanemorris.com

Alice E. Snedeker  
aesnedeker@duanemorris.com

John R. Gibson  
jrgibson@duanemorris.com

Duane Morris LLP  
1075 Peachtree Street NE Suite 1700  
Atlanta, Georgia 30309  
T: (404)-253-6900

***Counsel for Defendants AT&T Services Inc.; AT&T Mobility LLC; AT&T Corp., Verizon Communications, Inc.; Cellco Partnership d/b/a Verizon Wireless; T-Mobile USA, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on August 31, 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail on this same date.

/s/ Reza Mirzaie

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing the Joint Motion.

/s/ Reza Mirzaie